

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re Application of)
ATIKU ABUBAKAR)
For an Order Directing Discovery from)
CHICAGO STATE UNIVERSITY Pursuant to)
28 U.S.C. § 1782.)
Case No. 23-cv-05099
Honorable Nancy L. Maldonado
Magistrate Judge Jeffrey T. Gilbert

**SECOND DECLARATION OF ANGELA M. LIU IN SUPPORT OF
THE APPLICATION PURSUANT TO 28 U.S.C. § 1782
FOR AN ORDER TO TAKE DISCOVERY FROM CHICAGO STATE UNIVERSITY**

I, Angela M. Liu, state and declare as follows:

1. I am a partner of the law firm Dechert LLP, and attorney of record for Applicant Atiku Abubakar (“Applicant”) in the above-captioned action. I have personal knowledge of the matters set forth in this declaration, except as where specifically noted below, and if called upon as a witness I could and would testify competently thereto.

2. I submit this supplemental declaration in support of the Application, pursuant to 28 U.S.C. § 1782, for an Order granting leave to serve the subpoenas attached to the Application as Exhibits 3 and 4 (together, the “Subpoenas”), respectively, upon Respondent Chicago State University (“CSU”).

3. Attached hereto as Exhibit P is a true and correct copy of an article providing additional information relating to Dr. Elnora Daniel, one of the signatories to the diplomas at issue, who purportedly left the university in 2008. Melissa Isaacson, *Problems and Discontent Bedevil*

Chicago State, N.Y. TIMES, Nov. 28, 2009, available at
<https://www.nytimes.com/2009/11/29/us/29cncstate.html>

4. On or about August 9, 2023, I and Mr. Alexandre de Gramont (counsel for Mr. Abubakar), along with Mr. Michael Hayes (counsel for CSU) by Microsoft Teams video conference and Mr. Chris Carmichael (counsel for Mr. Tinubu) by phone met and conferred regarding objections to the Application, document requests, and deposition topics included in previous versions of the Subpoenas (“Original Subpoenas”). *See* Exhibits 1 and 2 (Dkts. 1-1, 1-2). Mr. de Gramont asked the parties if they had any objections to the document requests or deposition topics at issue in the Original Subpoenas or ideas on how to potentially narrow the requests. Mr. de Gramont further asked whether counsel for CSU or Mr. Tinubu would be willing to provide a proffer that explains the discrepancies between the two diplomas. On August 17, Mr. de Gramont then emailed to follow up, having not heard anything further. On August 22, the day before they filed their Responses, Mr. Carmichael continued to blanketly object to the Original Subpoenas and Mr. Hayes did not respond. Attached hereto as Exhibit Q is that correspondence.

5. Attached hereto as Exhibit R is a letter from CSU Registrar, Mr. Caleb Westberg, dated June 27, 2022, stating that Mr. Tinubu attended CSU. Mr. Abubakar seeks information from CSU regarding its position on the authenticity of the letter; the reasons that Mr. Westberg (or another CSU representative) prepared the letter; who requested its preparation; and to whom it was provided.

6. On information and belief, the Nigerian Court of Appeals issued a ruling on September 6, 2023, finding in favor of Mr. Tinubu in the Abubakar Proceeding. I have been advised that Mr. Abubakar intends to appeal this decision.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 6th day of September, 2023



Angela M. Liu